

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
Wireline Competition Bureau Seeks)	CC Docket No. 02-6
Comment on Petitions Regarding Off-Campus)	GN Docket No. 10-90
Use of Existing E-Rate Supported Connectivity)	WC Docket No. 13-184

COMMENTS of Final Mile Communications, Inc.

Final Mile Communications, Inc. ("FMC") submits these reply comments in response to the Public Notice released by the Wireline Competition Bureau in the above-captioned proceeding.

• **INTRODUCTION**

FMC is a systems integration company engaged in a number of innovative initiatives to assemble existing and emerging communications technology in addressing a wide range of communication solutions. Among them, FMC is actively investigating practical solutions for off-campus student digital equity or the "homework gap".

In these comments we specifically urge the Commission to expressly permit the use of existing E-rate supported services to allow Internet traffic and content originating at schools and students' homes to be directed to and carried over E-rate supported networks without creating an obligation on the applicant(s) to cost allocate out the portion of the traffic attributable to off-campus use.

• **DISCUSSION**

The FCC should allow use of E-rate supported connectivity for off-campus student & parent/guardian educational related purposes.

Previously revised E-rate rules allowed the general public to access E-rate supported school services and facilities when classes not in session. The revision maximizes the E-rate investment towards their intended purposes of use for the enhancement of the education experience. The school environment ensures that proper network security protocols and web filtering are in effect to achieve the intended purpose.

The Commission has recognized the importance of off-campus connectivity for students and library patrons. If the same intended security level can further increase and maximize an unchanged E-rate school network investment than the Commission further leverages the public investment with no risk.

As schools accelerate in the transition to digital learning, all students should be provided digital learning resources on and off-campus. If E-rate

supported connectivity and resulting digital learning objects can be safely accessed off-campus at no additional program costs, then it's logical to extend the benefits to our students.

• CONCLUSION

FMC urges the Commission to maximize E-rate connectivity investments by expressly permitting extension of supported connectivity for off-campus intended purposes on the following conditions:

- 1) No increase in program support costs.
- 2) Same security protocols off-campus as required on-campus.
- 3) Used for educational purposes.
- 4) Used by educators, students and their parents/guardians for educational purposes.

Respectfully Submitted by:

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